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ADMITTED IN FL ONLY

JAN - 6 1997

January 6, 1997

OUR FILE NO.  
0713-101-63

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, DC 20554

DOCKET FILE COPY ORIGINAL

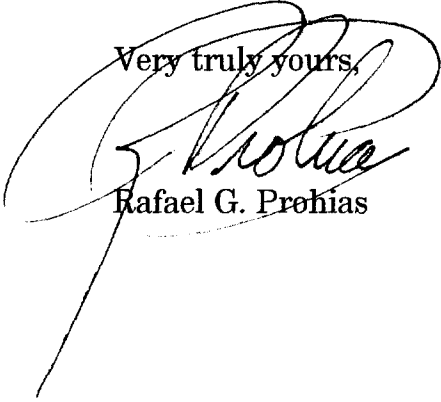
Re: MM Docket No. 96-232  
RM-8868  
Pueblo and Pueblo West, Colorado

Dear Mr. Caton:

Transmitted herewith, on behalf of Pueblo Broadcasters, Inc., are an original and four (4) copies of its Comments in the above-referenced rulemaking proceeding.

Kindly communicate any questions concerning this matter directly to this office.

Very truly yours,

  
Rafael G. Prohias

Enclosure (5)

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Before The  
**Federal Communications Commission**  
Washington, D.C. 20554

**In The Matter Of**

Amendment of Section 73.202(b)  
Table of Allotments,  
FM Broadcast Stations  
Pueblo, Colorado and  
Pueblo West, Colorado

MM Docket No. 96-232  
RM-8868

TO: Chief, Allocations Branch  
Policy and Rules Division  
Mass Media Bureau

JAN - 6 1997

**Comments and Counterproposal  
of Pueblo Broadcasters, Inc.**

By Petition for Rulemaking filed August 15, 1996, Pueblo

Broadcasters, Inc. ("PBI"), requested the Commission institute a rulemaking proceeding to amend Section 73.202(b) of the Commission's Rules, the Table of FM Allotments, by deleting Channel 283C2 from Pueblo, Colorado, and allotting Channel 283C2 to Pueblo West, Colorado, as that community's first local aural service. In response, the Commission released a *Notice of Proposed Rulemaking* ("NPRM") in the above-captioned proceeding proposing the requested changes to the Table of Allotments and soliciting the submission of comments by January 6, 1997. *See NPRM*, MM Dkt. 96-232, RM-8868, DA 96-1865. PBI, through counsel, hereby submits its Comments in response to the *NPRM*, and submits a Counterproposal to its Petition for Rulemaking, requesting allotment of Channel 280C1 to Pueblo West, Colorado, in lieu of

Channel 283C2, and further requesting the substitution of Channel 283A for Channel 280A at Canon City, Colorado. As will be shown below, PBI's Counterproposal is consistent with Commission policy and would advance the public interest. Accordingly, PBI's Counterproposal should be adopted.

**I. Background - Pueblo Broadcasters, Inc.'s Petition for Rulemaking.**

PBI is the licensee of radio station KYZX(FM), Pueblo, Colorado ("KYZX"), which operates on Channel 283C2. In its Petition for Rulemaking ("PBI Petition"),<sup>1</sup> PBI proposed to change its community of license from Pueblo to Pueblo West, Colorado, consistent with the procedures authorized in *Amendment of the Commission's Rules Regarding Modification of FM and TV Authorizations to Specify a New Community of License*, 4 FCC Rcd 4870 (1989), *recon. granted in part*, 5 FCC Rcd 7094 (1990) ("*New Community*" Rulemaking). PBI committed that, if the proposed amendment to the Table of Allotments were adopted, it would promptly construct the modified facilities, place those facilities into operation and seek a license covering the facilities.<sup>2</sup> PBI pointed out that allotting Channel 283C2 to Pueblo West would permit that community to receive its first local aural channel, thereby serving the highest of the Commission's existing allocation priorities.<sup>3</sup> As stated in the PBI Petition, Pueblo West is a quasi-municipal political subdivision, comprised of over 8,000

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<sup>1</sup> The PBI Petition is hereby incorporated by reference.

<sup>2</sup> See PBI Petition at 3.

<sup>3</sup> *Id.*

persons. It is a community separate and apart from the city of Pueblo. Pueblo West is approximately 10 miles west of Pueblo, and has its own municipal government, governed by a Board of Directors elected by the Pueblo West community. Pueblo West has a fire department, a county sheriff's department, a public works department and water and sewage treatment plants. Pueblo West also has its own post office and zip code (81007), and is separately listed in the 1990 U.S. Census as a Census Designated Place.

## **II. PBI's Counterproposal**

In lieu of allotting Channel 283C2 to Pueblo West as originally proposed in the PBI Petition, PBI requests that the Commission amend the FM Table of Allotments, as set forth in Rule 73.202(b), 47 C.F.R. § 73.202(b), and allot Channel 280C1 to Pueblo West, Colorado. PBI also seeks substitution of Channel 283A for Channel 280A at Canon City, Colorado, which would be necessary in order to effectuate PBI's Counterproposal.<sup>4</sup>

As provided in the Technical Statement attached as *Exhibit A* hereto, Channel 280C1 can be awarded to Pueblo West at geographic coordinates North Latitude 38° 34' 52" and West Longitude 104° 31' 52", which would provide a site restriction of 33.5 kilometers north-northeast of the Pueblo West

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<sup>4</sup> PBI and KRLN, Inc., licensee of KSTY(FM), Canon City, Colorado, Channel 280A, have entered into an agreement whereby KRLN, Inc. has consented to the change in frequency and site relocation of KSTY(FM) as proposed by PBI, in exchange for reimbursement by PBI of the reasonable costs associated with such a change. Attached as *Exhibit B* hereto is a copy of KRLN, Inc.'s consent to PBI's counterproposal and the attendant change in frequency and site relocation of KSTY(FM). PBI hereby reaffirms its commitment to reimburse KRLN, Inc. for the costs incurred by KRLN, Inc. in changing the KSTY(FM) frequency and transmitter site as set forth in the agreement between PBI and KRLN, Inc.

community.<sup>5</sup> Further, Channel 283A can be allotted to Canon City, Colorado at geographic coordinates North Latitude 38° 23' 35" and West Longitude 105° 21' 07", representing a site restriction of 11.7 kilometers west-southwest of Canon City. No other full service broadcasters are affected by this proposal and operations from these coordinates would provide city grade service levels as set forth in Section 73.315 of the Commission's Rules. 47 C.F.R. § 73.315.<sup>6</sup>

If the Commission amends the FM Table of Allotments pursuant to PBI's Counterproposal as requested herein, PBI will promptly file an application for modification of its license, construct the modified facilities, place those facilities in operation, and will seek a license covering the Pueblo West facility.

### **III. Allocation of Channel 280C1 is Consistent with Commission Policy and is in the Public Interest.**

In its *New Community* Rulemaking, the Commission held that petitions requesting a change in community of license would be approved if the

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<sup>5</sup> This allocation reference site for Channel 280C1 at Pueblo West is only 6.5 kilometers east-northeast of the KYZX construction permit site on Channel 283C2. See FCC File No. BPH-951205IG. An application to cover the authorized construction permit facilities was forwarded to the Commission on January 3, 1997.

<sup>6</sup> PBI notes that pending before the Commission is a Petition for Rulemaking filed on behalf of Calhan Radio Company ("Calhan"), seeking the allotment of Channel 280A to Calhan, Colorado. The Commission has yet to issue a *Notice of Proposed Rulemaking* in connection with Calhan's Petition. However, should the Commission do so, Calhan's allocation proposal would be mutually exclusive with PBI's proposed substitution of Channel 283A for Channel 280C1 in Pueblo West, Colorado. Therefore, should the Commission determine that Calhan's proposal warrants consideration, PBI proposes that the Commission allot Channel 284A to Calhan rather than the requested Channel 280A. As demonstrated in the Technical Statement attached as *Exhibit A* hereto, Channel 284A can be allotted to Calhan at geographic coordinates North Latitude 39° 01' 42" and West Longitude 104° 15' 44", with a site restriction of 3.0 kilometers to the east-southeast of the community to avoid short-spacing radio station KSKE-FM, Vail, Colorado (Channel 284C1), in full compliance with the Commission's FM spacing rules. Operations from these coordinates would also provide city grade service levels as set forth in Section 73.315 of the Commission's Rules.

change would not have the effect of depriving a community of an existing service representing its sole local transmission outlet and if the allotment to the new community would serve the Commission's allotment priorities and policies more effectively than the allotment to the old community.<sup>7</sup> As stated in PBI's Petition for Rulemaking, deletion of Channel 283C2 from Pueblo would not leave the community without a local aural service inasmuch as six AM stations, six commercial stations and one noncommercial FM station remain licensed to Pueblo.<sup>8</sup>

Indeed, PBI's Counterproposal is consistent with the procedures authorized in the Commission's *New Community* Rulemaking. As was the case with PBI's initial proposal, PBI's Counterproposal would permit Pueblo West to receive its first local aural transmission service, thereby serving the highest of the Commission's existing allocation priorities. "There are virtually no populated areas of the country where our higher allotment priorities, such as first reception service, have not been attained. Therefore, as a practical matter, provision of first local aural service is the highest of our allotment priorities which remains in any significant degree unsatisfied."<sup>9</sup>

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<sup>7</sup> See *New Community* Rulemaking, 5 FCC Rcd at 7094 (1990).

<sup>8</sup> See PBI Petition at 6.

<sup>9</sup> 5 FCC Rcd at 7097, para. 16.

In addition, PBI's Counterproposal, because it would permit KYZX(FM) to achieve Class C1 status, would provide 1.0 mV/m service to 562,351 persons within a 16,411.4 square kilometer radius — an increase of 92,759 persons in 8,130 square kilometers.<sup>10</sup> Moreover, upon substitution of Channel 283A for 280A in Canon City, KSTY(FM) can improve to maximum 6.0 kilowatt equivalent Class A facilities, thus resulting in an increase of 4,444 persons in 1,790.4 square miles.<sup>11</sup>

In sum, Pueblo has no scarcity of available spectrum, and allocation of Channel 280C1 to Pueblo West would result in a net service benefit to the Pueblo West and Canon City communities, and will best serve the Commission's allocation priorities and the public interest. Favorable action on PBI's Counterproposal would thus be in the public interest.

#### **IV. CONCLUSION**

The above facts demonstrate that Pueblo would continue to enjoy its own local aural transmission service should PBI's Counterproposal be adopted, and the Commission's allocation criteria would be better served by the allocation of Channel 280C1 to Pueblo West, as such allocation would provide that community with its first local aural transmission. Accordingly, PBI respectfully requests the following amendment to the FM Table of Allotments:

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<sup>10</sup> See Exhibit A - Technical Statement at 5.

<sup>11</sup> *Id.*

City	Present Allotment	Proposed Allotment
Pueblo, Colorado	245C, 255C, 260C, 264C, 283C2, 296C2, 300C1	245C, 255C, 260C, 264C, 296C2, 300C1
Pueblo West, Colorado	None	280C1
Canon City, Colorado	280A	283A
Calhan, Colorado	None	284A <sup>12</sup>

Respectfully submitted,

**PUEBLO BROADCASTERS, INC.**

By: 

John M. Pelkey  
Rafael G. Prohias

Its Attorneys

**HALEY BADER & POTTS P.L.C.**

Suite 900

4350 North Fairfax Drive

Arlington, VA 22203-1633

703/841-0606

January 6, 1997

<sup>12</sup>

As stated in footnote 5 *supra*, PBI respectfully requests that the Commission allot Channel 284A only if it finds that Calhan's Petition for Rulemaking warrants consideration.



**EXHIBIT A**

**Technical Exhibit**

# GRAHAM BROCK, INC.

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BROADCAST TECHNICAL CONSULTANTS

**COMMENTS AND COUNTERPROPOSAL  
MM DOCKET #96-232  
PUEBLO BROADCASTERS, INC.  
KYZX RADIO STATION  
PUEBLO WEST, COLORADO  
December 1996**

**TECHNICAL EXHIBIT**

*Copyright 1996*

**COMMENTS AND COUNTERPROPOSAL**  
**MM DOCKET #96-232**  
**PUEBLO BROADCASTERS, INC.**  
**KYZX RADIO STATION**  
**PUEBLO WEST, COLORADO**  
**December 1996**

**TECHNICAL STATEMENT**

1. This Technical Statement and attached exhibits were prepared on behalf of Pueblo Broadcasters, Inc. ("PBI"), licensee of radio station KYZX, Channel 283C2, Pueblo, Colorado. PBI is also the petitioner in MM Docket #96-232 seeking the reallocation of Channel 283C2 from Pueblo to Pueblo West, Colorado, as that community's first local service.

2. PBI herein files a counterproposal requesting the allocation of Channel 280C1 to Pueblo West, Colorado, in lieu of Channel 283C2 at Pueblo West (Pueblo). In order to accommodate this counterproposal, it is also necessary to substitute Channel 283A for Channel 280A at Canon City, Colorado. PBI has an agreement with the licensee of the Canon City facility in which he consents to the change in frequency and change in site that the substitution of channels requires.

3. In the process of preparing this counterproposal, PBI was made aware of the request of Calhan Radio Company who seeks to allocate Channel 280A to Calhan, Colorado. The proposed allocation of Channel 280A to Calhan is in conflict with the herein requested Channel 280C1 allocation at Pueblo West. The Notice of Proposed Rule Making involving Calhan, RM 8900, has to date not been issued by the Commission's staff. However, in light of the proposed changes proposed in this counterproposal, PBI demonstrates that an alternate channel is available for Calhan, Colorado, which is not in conflict with the requests contained herein.

## **DISCUSSION**

4. The allotment of Channel 280C1 to Pueblo West, Colorado, is mutually exclusive with the currently authorized facilities of KYZX, Channel 283C2, Pueblo, Colorado, and in conflict with the proposed allotment of Channel 283C2 to Pueblo West as outlined in MM Docket #96-232. Further, as denoted in the original request for rule making, the reallocation of the channel from Pueblo to Pueblo West is not requesting a rural facility be moved into an urbanized area as the current facility is licensed to Pueblo and provides service to the Pueblo Urbanized Area. Pueblo West is a part of the Pueblo Urbanized Area. In addition, the proposed allotment will provide for greatly expanded service for KYZX over its currently authorized C2 facilities and those facilities proposed in the original Notice of Proposed Rule Making. Further, the reallocation of the channel from Pueblo to Pueblo West will not deprive Pueblo of its only local service, since Pueblo will retain service from fifteen authorized stations after the channel is reallocated to Pueblo West.

## **PROPOSAL**

5. Channel 280C1 can be allotted to Pueblo West, Colorado, at geographic coordinates North Latitude 38° 34' 52" and West Longitude 104° 31' 52". This represents a site restriction of 33.5 kilometers north-northeast of the community to avoid shortspacing the proposed allotment of Channel 283A at Canon City, Colorado, as detailed below.<sup>1</sup> A 3.16 mV/m contour can be placed over the community from the reference site. Exhibit #1 is a usable area study denoting where a transmitter site for Channel 280C1 at Pueblo West could be located.

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1) The allocation reference site for Channel 280C1 at Pueblo West is only 6.5 kilometers east-northeast of the KYZX construction permit site on Channel 283C2 (BPH-951205IG). In addition, at this location the Federal Aviation Administration has already approved a tower structure well in excess of that needed for a maximum Class C1 facility for Pueblo West. In Aeronautical Study #85-ANW-0379-OE, the Federal Aviation Administration approved a 1,349 foot above ground structure. The tower was previously used by station KGFT, Channel 264C, Pueblo, Colorado. The site was abandoned by the station several years ago. However, the transmitter building and tower foundations remain at the site and available for use by PBI.

Exhibit #2 is a §73.207 spacing analysis for Channel 280C1 demonstrating the proposed allotment meets the Commission's minimum distance separation requirements to all licensed, applied for or proposed facilities with the exception of station KSTY, Canon City, Colorado, and the proposed Channel 280A allotment at Calhan, Colorado, as detailed further below.

6. Channel 283A can be allotted to Canon City, Colorado, at geographic coordinates North Latitude 38° 23' 35" and West Longitude 105° 21' 07". This represents a site restriction of 11.7 kilometers west-southwest of the community in order to avoid shortspacing the proposed allotment of Channel 280C1 at Pueblo West. A 3.16 mV/m contour can be placed over the community from the reference site. Exhibit #3 is a usable area study for Channel 283A at Canon City. Exhibit #4 is a §73.207 spacing analysis which reflects that the channel meets the Commission's minimum distance separation requirements from the reference site to all licensed, applied for or proposed facilities with the exception of KYZX in Pueblo who will vacate Channel 283C2 as part of this rule making.

7. In order to accommodate the proposed Channel 280C1 allotment to Pueblo West, it is necessary for an alternate channel to be used in lieu of the proposed Channel 280A allotment at Calhan. Based on the proposed changes at Pueblo West and Canon City, as detailed above, it will be possible to allot Channel 284A to Calhan rather than the requested Channel 280A. Channel 284A can be allotted to Calhan with a site restriction of 3.0 kilometers to the east-southeast of the community to avoid shortspacing station KSKE-FM, Channel 284C1, Vail, Colorado at geographic coordinates North Latitude 39° 01' 42" and West Longitude 104° 15' 44".<sup>2</sup> A 3.16 mV/m contour can be delivered over Calhan from the proposed reference site. Exhibit #5 is a usable area map denoting where a transmitter site for Channel 284A can be

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2) This represents a significantly lesser site restriction than the proposed Channel 280A

located to provide service to Calhan. Exhibit #6 is a \$73.207 spacing analysis demonstrating that Channel 284A meets the Commission's minimum distance separation requirements to all licensed, applied for or proposed facilities with the exception of KYZX in Pueblo which will relocate to Channel 280C1 as part of this request. It should be noted that the proposed alternate channel forwarded by PBI for Calhan in no way expresses PBI's interest to file for the channel if it is allotted. PBI merely indicates that this channel is available should the Commission deem Calhan, Colorado, worthy of an allotment.

8. Therefore, PBI requests the following amendment to the Commission's Table of Allotments:

**Pueblo West,**

<u>Present</u>	<u>Proposed</u>
None	280C1

**Pueblo, Colorado**

<u>Present</u>	<u>Proposed</u>
245C, 255C, 260C, 264C, 283C2, 296C2, 300C1	245C, 255C, 260C, 264C, 296C2, 300C1

**Canon City, Colorado**

<u>Present</u>	<u>Proposed</u>
280A	283A

**Calhan, Colorado**

<u>Present</u>	<u>Proposed</u>
None	284A <sup>3</sup>

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3) Should the Commission deem an allotment to this community as being in the public interest.

## **PUBLIC INTEREST ASPECTS**

9. A maximum Class C1 allocation on Channel 280 from the proposed reference site at Pueblo West will provide 1.0 mV/m service to 562,351 persons in 16,411.4 square kilometers. This represents an increase of 92,759 persons in 8,130.0 square kilometers. Further, once Channel 283A is substituted for Channel 280A at Canon City, station KSTY will be able to improve to maximum 6.0 kilowatt equivalent Class A facilities. This will enable it to serve 30,932 persons in 2,401.8 square kilometers, which reflects an increase of 4,444 persons in 1,790.4 square kilometers. It should be noted the improved allotments at Pueblo West and Canon City will not create any loss of service, based on the proposed reference sites for the upgraded facilities as compared to the authorized facilities at each community.<sup>4</sup> Further, the allotment of Channel 280C1 to Pueblo West and Channel 283A to Canon City will not preclude the allotment of a Class A channel to Calhan, Colorado.<sup>5</sup>

10. PBI indicates that it will reimburse the licensee of KSTY for reasonable expenses to make the change in channels and site at Canon City, Colorado. Further, PBI will file, on a timely basis, an application for a construction permit to operate KYZX on Channel 280 at Pueblo West, Colorado.

11. The foregoing Technical Statement and attached exhibits were prepared on behalf of Pueblo Broadcasters, Inc., by Graham Brock, Inc., its Technical Consultants. All information contained herein is true and accurate to the best of our belief and knowledge. All data relating to the FM facilities is extracted from the NTIA database as updated on December 20, 1996. We

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4) The authorized facilities for KYZX are based on its authorized construction permit, File #BPH-951205IG.

5) From the Channel 284A reference site indicated above, a maximum 6.0 kilowatt Class A facility at Calhan will provide 1.0 mV/m service to 4,712 persons in 2,375.4 square kilometers.

assume no liability for errors or omissions in that database that may be adverse to the requests contained herein. All population figures are based on 1990 Census figures as extracted from the PL 94-171 computer files.





ALLOCATION STUDY FOR PUEBLO WEST, COLORADO  
USING PROPOSED ALLOCATION SITE AS REFERENCE

REFERENCE		CLASS C1		DISPLAY DATES			
38 34 52 N		Current rules spacings		DATA 12-20-96			
104 31 52 W		CHANNEL 280 -103.9 MHz		SEARCH 12-26-96			
-----							
CALL TYPE	CH# LAT	CITY LNG	STATE PWR	BEAR' HT	D-KM D-Mi	R-KM R-Mi	MARGIN (KM)
-----							
AD280	280C1	Pueblo West	CO	0.0	0.00	245.0	-245.00
AD	38 34 52	104 31 52	0.000 kW	0M	0.0	152.3	
Pueblo Broadcasters, Inc.							
-----							
* KSTY	280A	Canon City	CO	257.6	61.90	200.0	-138.10
LI CN	38 27 35	105 13 26	3.000 kW	-158M	38.5	124.3	
KRLN, Inc.				BLH-6701			
KYZX.C	283C2	Pueblo	CO	245.3	6.50	79.0	-72.50
CP CN	38 33 24	104 35 56	50.000 kW	150M	4.0	49.1	
Pueblo Broadcasters, Inc.				BPH-951205IG			
AD283	283C2	Pueblo West	CO	245.3	6.50	79.0	-72.50
AD	38 33 24	104 35 56	0.000 kW	0M	4.0	49.1	
Pueblo Broadcasters, Inc.				RM-8868			
>Site Restriction 22.2km North							
KYZX	283C2	Pueblo	CO	200.3	26.45	79.0	-52.55
LI ZCN	38 21 28	104 38 12	50.000 kW	105M	16.4	49.1	
Pueblo Broadcasters, Inc.				BLH-930518KB			
-----							
+ AD283	283A	Canon City	CO	253.9	74.60	75.0	-0.40
AD	38 23 35	105 21 07	0.000 kW	0M	46.4	46.6	
Pueblo Broadcasters, Inc.				RM-8900			
KBVC.C	281C3	Buena Vista	CO	277.7	146.28	144.0	2.28
CPMZCN	38 44 45	106 11 55	0.600 kW	362M	90.9	89.5	
Riley M. Murphy				BMPH-951215IC			
KSNOFM	280A	Snowmass Village	CO	290.5	220.03	200.0	20.03
AP CN	39 14 51	106 55 13	6.000 kW	99M	136.8	124.3	
Rocky Mountain Radio Company				BMLH-960220KC			
KSNOFM	280A	Snowmass Village	CO	290.5	220.03	200.0	20.03
LI CN	39 14 51	106 55 13	2.500 kW	99M	136.8	124.3	
Rocky Mountain Radio Company				BLH-850404KK			
KNABFM	281C1	Burlington	CO	67.3	212.23	177.0	35.23
LI CN	39 17 41	102 15 37	51.000 kW	110M	131.9	110.0	
KNAB, Inc.				BLH-900222KD			
KRFX	278C	Denver	CO	334.8	141.38	105.0	36.38
LI CN	39 43 50	105 14 07	100.000 kW	320M	87.9	65.3	
Jacor Broadcasting of Colorado				BLH-4823			

**ALLOCATION STUDY CHANNEL 280C1**

\* NOTE : KSTY IS TO MOVE TO CHANNEL 283A  
AS PART OF THIS PROPOSAL.

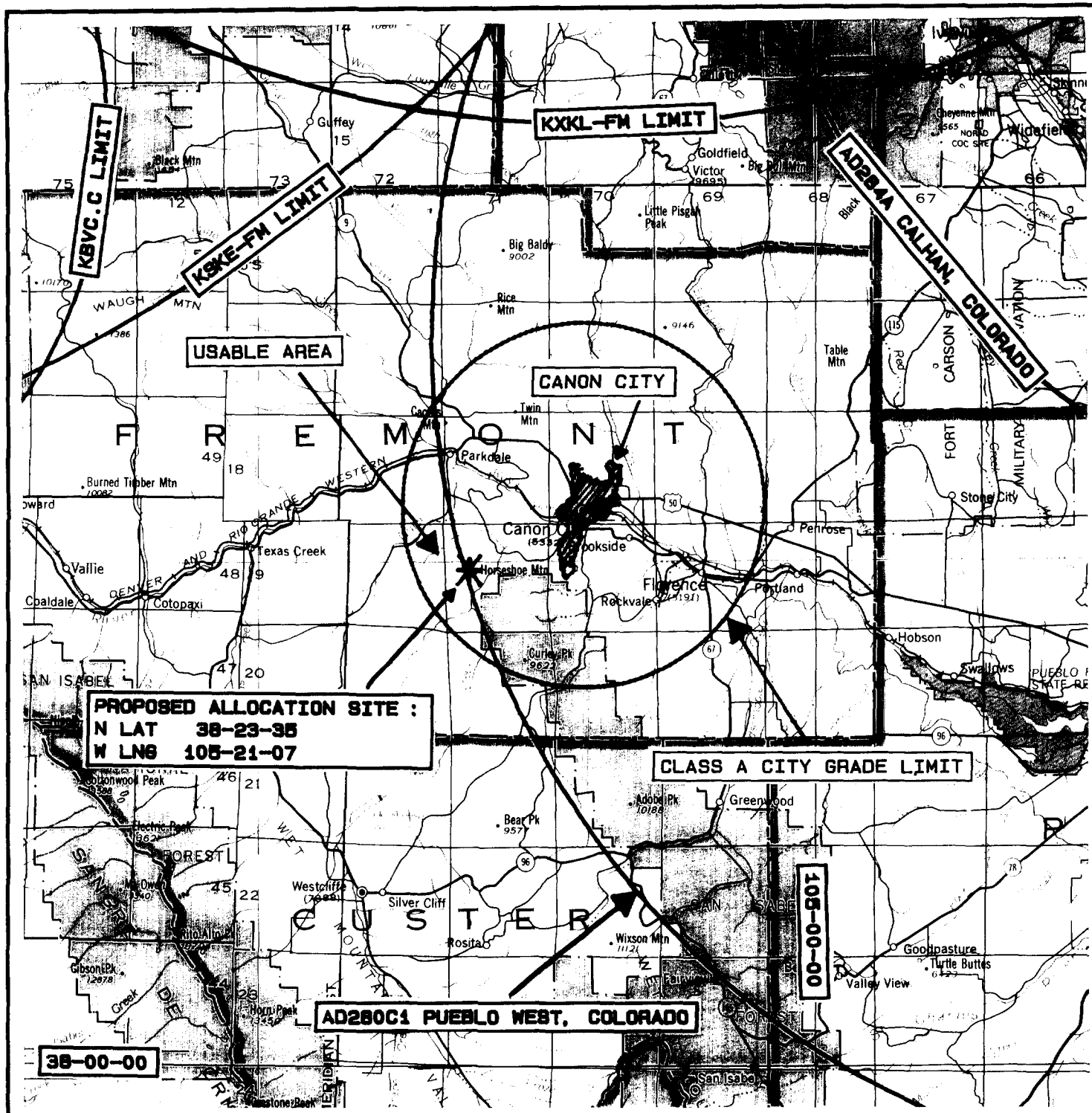
+ NOTE : THE SPACING TO AD283A IS SHOWN AS  
-0.4 KM. SINCE THIS IS LESS THAN  
0.49 IT ROUNDS TO ZERO.

**EXHIBIT #2**

**COMMENTS & COUNTERPROPOSAL  
MM DOCKET # 96-232  
PUEBLO BROADCASTERS, INC.  
ALLOT CHANNEL 280C1  
PUEBLO WEST, COLORADO  
December 1996**

**GRAHAM BROCK, INC.**

**BROADCAST TECHNICAL CONSULTANTS**



### USABLE AREA CHANNEL 283A

MAP IS A PORTION OF THE 1: 500, 000 SCALE  
U.S.G.S. BASE MAP OF COLORADO.

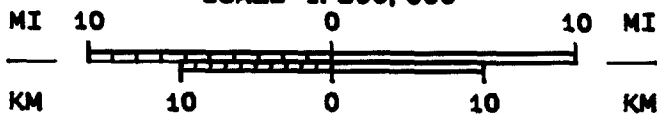
MAP ASSUMES KYZX ON CHANNEL 280C1 AT  
PUEBLO WEST, COLORADO.

### EXHIBIT #3

COMMENTS & COUNTERPROPOSAL  
MM DOCKET # 96-232  
PUEBLO BROADCASTERS, INC.  
ALLOT CHANNEL 280C1  
PUEBLO WEST, COLORADO

December 1986

SCALE 1: 500, 000



# GRAHAM BROCK, INC.

BROADCAST TECHNICAL CONSULTANTS

ALLOCATION STUDY FOR CANON CITY, COLORADO  
USING PROPOSED ALLOCATION SITE AS REFERENCE

REFERENCE	CLASS A	DISPLAY DATES
38 23 35 N		DATA 12-20-96
105 21 07 W	Current rules spacings	SEARCH 12-26-96
----- CHANNEL 283 -104.5 MHz -----		

CALL TYPE	CH# LAT	CITY LNG	STATE PWR	BEAR' HT	D-KM D-Mi	R-KM R-Mi	MARGIN (KM)
AD283	283A	Canon City	CO	0.0	0.00	115.0	-115.00
AD	38 23 35	105 21 07	0.000 kW	OM	0.0	71.5	
Pueblo Broadcasters, Inc.							
* KYZX	283C2	Pueblo	CO	93.4	62.63	166.0	-103.37
LI 3CN	38 21 28	104 38 12	50.000 kW	105M	38.9	103.2	
Pueblo Broadcasters, Inc. BLH-930518KB							
* AD283	283C2	Pueblo West	CO	74.3	68.18	166.0	-97.82
AD	38 33 24	104 35 56	0.000 kW	OM	42.4	103.2	
Pueblo Broadcasters, Inc. RM-8868							
* KYZX.C	283C2	Pueblo	CO	74.3	68.18	166.0	-97.82
CP CN	38 33 24	104 35 56	50.000 kW	150M	42.4	103.2	
Pueblo Broadcasters, Inc. BPH-951205IG							
KSTY	280A	Canon City	CO	56.4	13.41	31.0	-17.59
LI CN	38 27 35	105 13 26	3.000 kW	-158M	8.3	19.3	
KRLN, Inc. BLH-6701							
+ AD280	280C1	Pueblo West	CO	73.4	74.60	75.0	-0.40
DE	38 34 52	104 31 52	0.000 kW	OM	46.4	46.6	
Pueblo Broadcasters, Inc.							
KSKEFM	284C1	Vail	CO	326.0	167.35	133.0	34.35
LI EN	39 38 08	106 26 46	100.000 kW	120M	104.0	82.7	
KSKE, LLC BLH-960801KC							
KXKLFM	286C	Denver	CO	5.2	134.55	95.0	39.55
LI CN	39 36 00	105 12 35	100.000 kW	356M	83.6	59.0	
Shamrock Broadcasting, Inc. BLH-901023KB							
KBVC.C	281C3	Buena Vista	CO	298.3	83.54	42.0	41.54
CPM3CN	38 44 45	106 11 55	0.600 kW	362M	51.9	26.1	
Riley M. Murphy BMPH-951215IC							
AD229	229C3	Salida	CO	280.9	55.92	12.0	43.92
AD	38 29 10	105 58 53	0.000 kW	OM	34.8	7.5	
Cyrus Esphahanian RM-8904							
>Site Restriction 5.1km South							
AD284	284A	Calhan	CO	52.9	118.14	72.0	46.14
AD	39 01 42	104 15 44	0.000 kW	OM	73.4	44.8	
Pueblo Broadcasters, Inc.							

**ALLOCATION STUDY CHANNEL 283A**

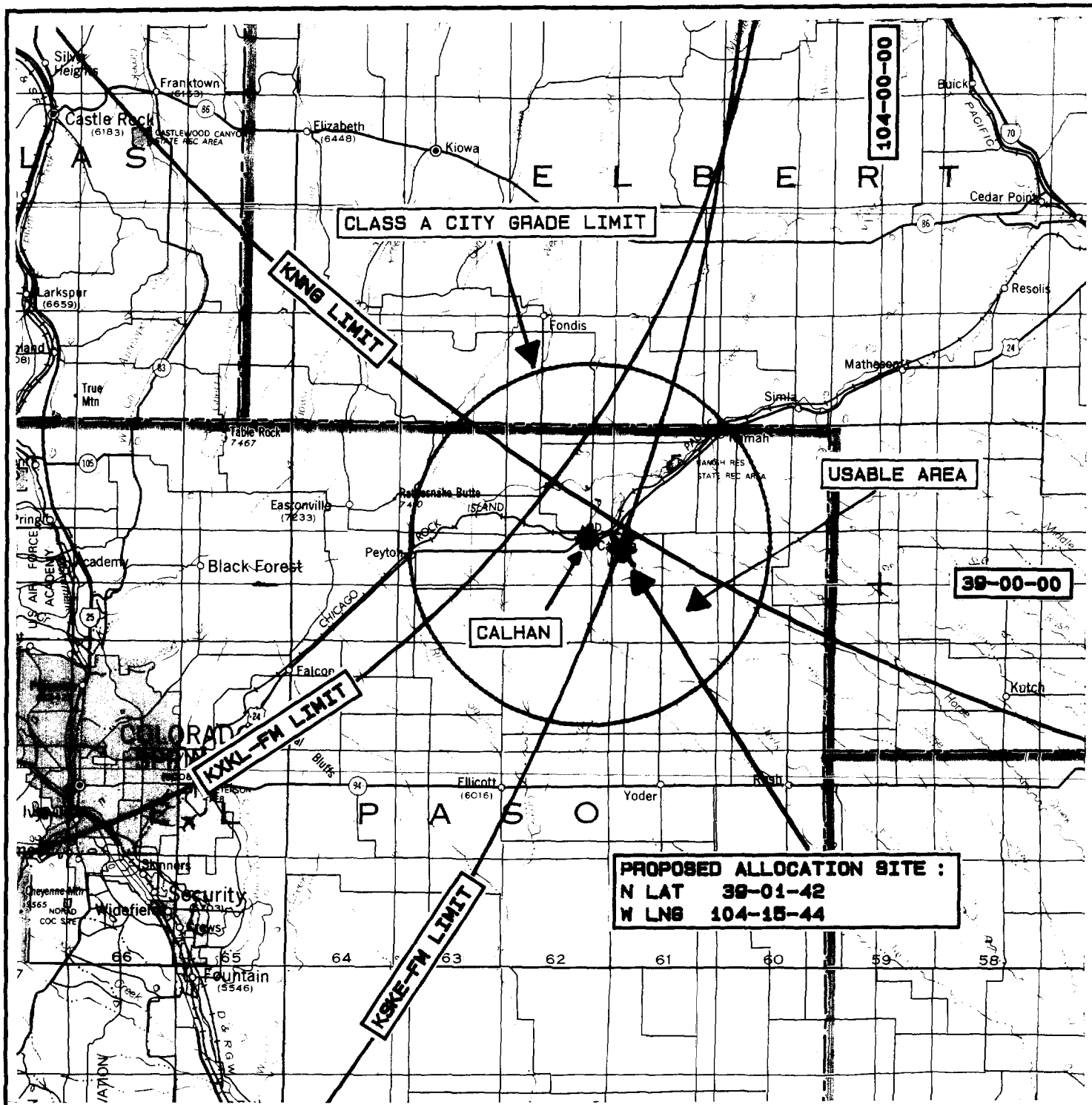
- \* NOTE : KYZX TO MOVE TO CHANNEL 280C1 AS PART OF THIS PROPOSAL.
- + NOTE : THE SPACING TO AD280 IS SHOWN AS -0.4 KM. SINCE THIS IS LESS THAN 0.49 KM IT ROUNDS TO ZERO.

**EXHIBIT #4**

**COMMENTS & COUNTERPROPOSAL  
MM DOCKET # 96-232  
PUEBLO BROADCASTERS, INC.  
ALLOT CHANNEL 280C1  
PUEBLO WEST, COLORADO  
December 1996**

**GRAHAM BROCK, INC.**

BROADCAST TECHNICAL CONSULTANTS



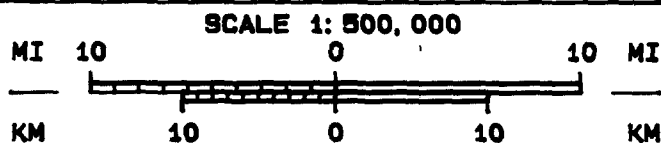
### USABLE AREA CHANNEL 284A

MAP IS A PORTION OF THE 1: 500, 000 SCALE  
U.S.G.S. BASE MAP OF COLORADO.

MAP ASSUMES KYZX ON CHANNEL 280C1 AT  
PUEBLO WEST, COLORADO.

### EXHIBIT #5

COMMENTS & COUNTERPROPOSAL  
MM DOCKET # 96-232  
PUEBLO BROADCASTERS, INC.  
ALLOT CHANNEL 280C1  
PUEBLO WEST, COLORADO  
December 1996



# GRAHAM BROCK, INC.

BROADCAST TECHNICAL CONSULTANTS

ALLOCATION STUDY FOR CALHAN, COLORADO  
USING PROPOSED ALLOCATION SITE AS REFERENCE

REFERENCE	CLASS A	DISPLAY DATES
39 01 42 N		DATA 12-20-96
104 15 44 W	Current rules spacings	SEARCH 12-27-96
----- CHANNEL 284 -104.7 MHz -----		

CALL TYPE	CH# LAT	CITY LNG	STATE PWR	BEAR' HT	D-KM D-Mi	R-KM R-Mi	MARGIN (KM)
AD284	284A	Calhan	CO	0.0	0.00	115.0	-115.00
AD	39 01 42	104 15 44	0.000 kW	0M	0.0	71.5	
Pueblo Broadcasters, Inc. - Alternate Channel							
-----							
* KYZX.C	283C2	Pueblo	CO	209.2	59.98	106.0	-46.02
CP CN	38 33 24	104 35 56	50.000 kW	150M	37.3	65.9	
Pueblo Broadcasters, Inc. BPH-951205IG							
-----							
* AD283	283C2	Pueblo West	CO	209.2	59.98	106.0	-46.02
AD	38 33 24	104 35 56	0.000 kW	0M	37.3	65.9	
Pueblo Broadcasters, Inc. RM-8868							
-----							
* KYZX	283C2	Pueblo	CO	203.7	81.25	106.0	-24.75
LI ZCN	38 21 28	104 38 12	50.000 kW	105M	50.5	65.9	
Pueblo Broadcasters, Inc. BLH-930518KB							
-----							
KSKEFM	284C1	Vail	CO	290.5	200.00	200.0	0.00
LI EN	39 38 08	106 26 46	100.000 kW	120M	124.3	124.3	
KSKE, LLC BLH-960801KC							
-----							
KNNG	284C1	Sterling	CO	30.9	202.17	200.0	2.17
LI CN	40 34 57	103 01 56	100.000 kW	198M	125.7	124.3	
KSTC, Inc. BLH-810402AB							
-----							
KXKLFM	286C	Denver	CO	308.2	103.47	95.0	8.47
LI CN	39 36 00	105 12 35	100.000 kW	356M	64.3	59.0	
Shamrock Broadcasting, Inc. BLH-901023KB							
-----							
AD283	283A	Canon City	CO	233.6	118.14	72.0	46.14
AD	38 23 35	105 21 07	0.000 kW	0M	73.4	44.8	
Pueblo Broadcasters, Inc. RM-8868							
-----							

**ALLOCATION STUDY CHANNEL 284A**

\* NOTE : KYZX TO MOVE TO CHANNEL 280C1 AS PART OF THIS PROPOSAL.

**EXHIBIT #6**

**COMMENTS & COUNTERPROPOSAL  
MM DOCKET # 96-232  
PUEBLO BROADCASTERS, INC.  
ALLOT CHANNEL 280C1  
PUEBLO WEST, COLORADO  
December 1996**

**GRAHAM BROCK, INC.**

BROADCAST TECHNICAL CONSULTANTS

**AFFIDAVIT AND QUALIFICATIONS OF CONSULTANT**

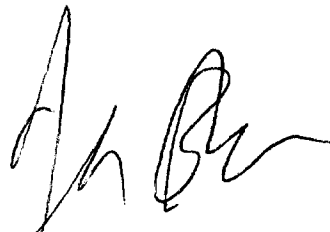
*State of Georgia )*  
*St. Simons Island ) ss:*  
*County of Glynn )*

**JEFFERSON G. BROCK**, being duly sworn, deposes and says that he is an officer of Graham Brock, Inc. Graham Brock has been engaged by Pueblo Broadcasters, Inc., licensee of Radio Station KYZX, to prepare the attached Technical Exhibit.


His qualifications are a matter of record before the Federal Communications Commission. He has been active in Broadcast Engineering since 1979.

The attached report was either prepared by him or under his direction and all material and exhibits attached hereto are believed to be true and correct.

*This the 27th day of December, 1996.*

  
\_\_\_\_\_  
Jefferson G. Brock  
Affiant

*Sworn to and subscribed before me*  
*this the 27th day of December, 1996*

  
\_\_\_\_\_  
Notary Public, State of Georgia  
My Commission Expires: September 12, 1999

**EXHIBIT B**

**KRLN, Inc. Consent**



# ***KRLN, Inc.***

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12/12/96

*Norton E. Warner*  
*President*

Mr. Martin Hart  
Chairman of the Board  
Pueblo Broadcasters, Inc.  
875 Race Street  
Denver, CO 80206

Dear Sir:

This letter is to notify you, and can be used to formally notify the Federal Communications Commission, that KRLN, Inc., licensee of KSTY(FM), Canon City, Colorado, consents to a modification of its current authorization effecting a change of its channel, and a relocation of its transmitter site, if necessary, as required by your proposal.

Sincerely,

KRLN, Inc.

By: 